

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 08-CR-53

v.

EMANUEL PRINCE, et al.,

Defendants.

UNITED STATES BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by its attorneys, Steven M. Biskupic, United States Attorney for the Eastern District of Wisconsin, and John J. Manning, Assistant United States Attorney for said District, files this Bill of Particulars to notify the Court and the Defendants of its intent to add to the forfeiture provision of the Indictment filed February 12, 2008, the following items:

1. One 2002 Chevrolet Venture Van bearing VIN 1GNDX03EX2D232970 seized from the residence located at 6156 North 37th Street, Milwaukee, Wisconsin, on or about February 14, 2008;
2. Miscellaneous items of jewelry seized from the residence located at 4053 North 87th Street, Milwaukee, Wisconsin, on or about February 14, 2008;
3. Approximately \$52,004 in United States currency seized from the residence located at 6401 West Birch Street, Milwaukee, Wisconsin on or about February 14, 2008;
4. Approximately \$10,000 in United States currency seized from the residence located at 1950 West Nash Street, Milwaukee, Wisconsin on or about February 14, 2008;
5. Approximately \$8,000 in United States currency seized from the residence located at 3648 North 19th Street, Milwaukee, Wisconsin on or about February 14, 2008;
6. One Remington Sportmaster .22 caliber rifle, model 512, seized from the residence located at 3802 North 16th Street, Milwaukee, Wisconsin on or about February 14, 2008;

7. One DPMS Panther Arms rifle, model A-15, serial number F071904, seized from the residence located at 3648 North 19th Street, Milwaukee, Wisconsin on or about February 14, 2008;
8. One Marksman Repeater pellet gun seized from the residence located at 3648 North 19th Street, Milwaukee, Wisconsin on or about February 14, 2008;
9. One Ruger pistol, model P95DC, serial number 311-22942, seized from the residence located at 3648 North 19th Street, Milwaukee, Wisconsin on or about February 14, 2008;
10. One Smith and Wesson .44 magnum revolver, serial number CCN3696, seized from the residence located at 5773 North 94th Street, Apartment 6, Milwaukee, Wisconsin on or about February 14, 2008;
11. One Taurus 9mm pistol, model PT 24/7, serial number TXE71314, seized from the residence located at 5773 North 94th Street, Apartment 6, Milwaukee, Wisconsin on or about February 14, 2008;
12. One Smith and Wesson .40 caliber, model SW40F, serial number PAM8036, seized from the residence located at 3710 North 17th Street, Milwaukee, Wisconsin on or about February 14, 2008;
13. One Raven Arms .25 automatic pistol, model MP-25, serial number 1162078, seized from the residence located at 3153 North 33rd Street, Milwaukee, Wisconsin on or about February 14, 2008;
14. One Smith and Wesson .40 caliber pistol, model SW40OVE, serial number PBD2318, seized from the residence located at 3153 North 33rd Street, Milwaukee, Wisconsin on or about February 14, 2008;
15. One Smith and Wesson, model 6906, serial number VAV3872, seized from the residence located at 1838 North 25th Street, Milwaukee, Wisconsin on or about February 14, 2008;
16. One Glock 9mm pistol, model 26, serial number BRX508US, seized from the residence located at 6156 North 37th Street, Milwaukee, Wisconsin on or about February 14, 2008;
17. Approximately \$107 in United States currency seized from defendant Emanuel Prince's person at the time of his arrest on or about February 14, 2008;
18. Approximately \$200 in United States currency seized from defendant Corey Bovia's person at the time of his arrest on or about February 14, 2008;

19. Approximately \$567 in United States currency seized from defendant James Williams' person at the time of his arrest on or about February 14, 2008;
20. Approximately \$199 in United States currency seized from defendant Otis Dunning's person at the time of this arrest on or about February 14, 2008;
21. Approximately \$736 in United States currency seized from defendant Willie Evans' person at the time of his arrest on or about February 14, 2008;
22. Approximately \$1,800 in United States currency seized from the residence located at 3507 North Teutonia Avenue, Milwaukee, Wisconsin on or about February 14, 2008;
23. Approximately \$90 in United States currency seized from defendant Theodore Wilder's person at the time of his arrest on or about February 14, 2008;
24. Approximately \$456 in United States currency seized from defendant Toussaint Anthony's person at the time of his arrest on or about February 14, 2008;
25. Miscellaneous removable diamond teeth covers seized from Public Storage Unit 074 located at 6676 West Appleton Avenue, Building C, Milwaukee, Wisconsin on or about March 12, 2008;
26. Approximately \$3,150 in United States currency seized from Public Storage Unit 074 located at 6676 West Appleton Avenue, Building C, Milwaukee, Wisconsin on or about March 12, 2008;
27. Approximately \$90,000 in United States currency seized from a hidden compartment in a 2002 Chevrolet Avalanche registered to Sergio Hernandez on or about March 14, 2008;
28. Approximately \$2,355 in United States currency seized from the residence located at 4054 North 62nd Street, Milwaukee, Wisconsin on or about January 9, 2008;
29. One Norico, model MAK-90 Sporter, 7.62 x 38mm rifle, which was abandoned at the direction of defendant Keith Callahan and seized on April 25, 2008;
30. One 7.62mm SKS rifle, which was abandoned at the direction of defendant Keith Callahan and seized on April 25, 2008; and
31. Miscellaneous Specialty Plastic Products Incorporated body armor and fragmentation, which was abandoned at the direction of defendant Keith Callahan and seized on April 25, 2008.

The United States of America also files this Bill of Particulars to amend the following item listed in the forfeiture provision of the February 12, 2008 Indictment:

1. Item N, which was listed in the Indictment as approximately \$15,235.44 seized from Omar Gollaz's Wells Fargo Account #701269XXXX, on January 22, 2008. The correct account number for the Wells Fargo Account is 881094XXXX.

Dated at Milwaukee, Wisconsin, this 19th day of May, 2008.

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